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Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi, Ltd.,  
et al., No. 13-cv-01173;*

*Sharp Electronics Corp. v. Koninklijke Philips  
Elecs., N.V., No. 13-cv-2776 SC.*

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF TIFFANY B.  
GELOTT IN SUPPORT OF  
KONINKLIJKE PHILIPS N.V.'S AND  
PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

Date: None set  
Time: 10:00 a.m.  
Place: Courtroom No. 1

Hon. Samuel Conti

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the  
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to  
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Philips  
6 Defendants Administrative Motion to File Documents under Seal Pursuant to the Civil Local  
7 Rules 7-11 and 79-5(d).

8 2. I have personal knowledge of the facts set forth herein and, if called upon, could  
9 and would competently testify thereto under oath.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)  
11 (the “Stipulated Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the  
13 Philips Defendants seek to file the following documents or portions thereof under seal:

- 14 a. Portions of the Joint Defense Motion *in Limine* #10: Motion to Exclude  
15 Evidence of Any Alleged CDT Price-Fixing Conspiracy (the “Motion”);
- 16 b. Exhibit 1 to Declaration of Tiffany B. Gelott in Support of the Motion  
17 (“Gelott Declaration”), the Expert Report of Jerry Hausman, dated April  
18 15, 2014; and
- 19 c. Exhibit 2 to the Gelott Declaration, interrogatories responses from Sharp  
20 Electronics Corporation and Sharp Electronics Manufacturing Company of  
21 America, Inc.’s First Supplemental Responses and Objections to  
22 Defendants Hitachi Electronic Devices (USA), Inc. and Samsung SDI  
23 America, Inc.’s First Set of Interrogatories, dated February 26, 2014.

24 5. The documents or portions of the documents submitted under seal contain either (a)  
25 material designated by Sharp pursuant to the Stipulated Protective Order (Dkt. 306, June 18,  
26 2008) as “Confidential” or “Highly Confidential” or (b) an analysis of, references to, or  
27 information taken directly from material designated by Sharp pursuant to the Stipulated  
28 Protective Order as “Confidential” or “Highly Confidential.”

Executed on February 13, 2015 in Washington, DC.

Tiffany B. Gelott